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Attorneys for Plaintiff
Foremost Insurance Company,
Grand Rapids, Michigan

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

FOREMOST INSURANCE COMPANY,
GRAND RAPIDS, MICHIGAN,

Plaintiff

vs.

MATTHEW DINOPIA; RHODA TO
RECOVERY, LLC d/b/a JOURNEY TO
RECOVERY; MICHELLI KALTSAS;
CHARLESTON RESIDENTIAL SERVICES,
LLC d/b/a CROSSROADS OF SOUTHERN
NEVADA; CARLENA BROWN, as Statutory
Heir and as Co-Administrator to the ESTATE
of GEORGE MITCHELL, JR.; GEORGE
MITCHELL, as Statutory Heir and as Co-
Administrator to the ESTATE of GEORGE
MITCHELL, JR., and DOES 1 -10,

Defendants

Case No.: 2:25-cv-00334-CDS-MDC

**STIPULATION FOR DISMISSAL OF
CARLENA BROWN AND GEORGE
MITCHELL WITH PREJUDICE**

FOREMOST INSURANCE COMPANY, GRAND RAPIDS, MICHIGAN
("Foremost"), and CARLENA BROWN, as Statutory Heir and as Co-Administrator to the
ESTATE of GEORGE MITCHELL, JR.; and GEORGE MITCHELL, as Statutory Heir and as
Co-Administrator to the ESTATE of GEORGE MITCHELL, JR. ("Brown-Mitchell") by and
through their undersigned attorneys, hereby stipulate and agree that this matter may be dismissed
as to Brown-Mitchell only with prejudice with each party to bear their own fees and costs. The

1 parties recognize that Brown-Mitchell assert no interest in the insurance contract that is the
2 subject of the declaratory relief action filed by Foremost in this matter.

3
4 DATED this 1st day of October, 2025.

5 /s/ Christian L. Moore, Esq.

6 Christian L. Moore, Esq., SBN #3777
7 LAXALT LAW GROUP, LTD.
8 9790 Gateway Drive, Suite 200
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10 (775) 322-1170
11 *Attorneys for Plaintiff*
12 *Foremost Insurance Company,*
13 *Grand Rapids, Michigan*

14 DATED this 1st day of October, 2025.

15 /s/ Kendelea Works, Esq.

16 Kendelea Works, SBN#9611
17 COGBURN DAVIDSON
18 2580 St. Rose Parkway, Suite 330
19 Henderson, NV 89074
20 (702) 747-6000
21 *Attorneys for Defendants Carlena*
22 *Brown and George Mitchell*

23 Based on the parties' stipulation,
24 defendants Carlena Brown and George
25 Mitchell are dismissed with prejudice, with
26 each party to bear its own costs and fees.

27 
28 _____
UNITED STATES DISTRICT JUDGE

Dated: October 3, 2025